to violate his oath. At all events, the matter rests largely within the discretion of the trial court, and a wide latitude is allowed in Michigan to afford a full inquiry into the history of the witness in order to illustrate his true character. *Wilbur* v. *Flood,* 16 Mich. 41; *Arnold* v. *Nye,* 23 Mich. 286. The doctrine of these early cases has been quite consistently adhered to in this state in the matter of interrogating a witness as to his conviction of crimes.

WORKMEN'S COMPENSATION—ACCIDENTAL INJURY.—A robust city fireman was called out to fight a fire on a bitterly cold day. He worked steadily for six and one-half hours. During that period he fought two stubborn fires with insufficient men. Expert evidence proved that the layer of ice one inch thick which formed at the back of his neck caused a contraction of the muscles, displacing the axis and at las vertebrae, producing pressure on the spinal cord, resulting in paralysis and death. *Held* (two judges dissenting), death was not due to accidental injury. *Savage* v. *City of Pontiac,* Mich., 1921), 183 N. W. 798.

Conceding that courts have not yet found an entirely satisfactory definition of *accident,* in both England and the United States they have quite generally agreed that the word must be interpreted according to its *ordinary and popular* meaning, and they have defined it as *an unlooked-for or untoward event which was not expected or designed.* *Fenton* v. *Thorley,* [1903], A. C. 443; *Brintons* v. *Turvey,* [1905], A. C. 230; *Bryant* v. *Fissell,* (1913), 84 N. J. L. 72; *Boody* v. *K. & C. Mfg. Co.,* (1914), 77 N. H. 208. The English and American cases generally hold that where the exposure is more than ordinary for that sort of employment, or where the other conditions vary from the normal in that employment so as to make it more hazardous, an injury resulting therefrom is an accidental injury. Where a miner died as a result of a chill contracted by reason of being required to stand in cold water up to his knees for twenty-five minutes, death was due to an accident. *Alloa Coal Co.* v. *Drylie,* (1913), W. C. & Ins. Rep. 213. Where, by reason of his boat overturning, a pilot got wet up to the thighs and contracted sciatica, it was held that he was injured by accident. *Barbeary* v. *Chugg,* (1915), 84 L. J. K. B. N. S. 504. Prostration by sunstroke may be found to be an accident. *Morgan* v. *The Zenaida,* (1919), 25 Times L. R. 446. Death resulting from a heat-stroke has been held to be an accident, even though the work of a trimmer on a steamship would naturally expose the workman to intense heat. *Ismay* v. *Williamson,* [1908], A. C. 437. A workman employed to cut grass along a railroad right-of-way suffered an accidental injury when he died from poison ivy infection. *Plass* v. *Central New England R. Co.,* (1915), 155 N. Y. Supp. 854. Where the employe is injured by a frostbite. the more recent cases would allow recovery for an injury by accident. *Days* v. *S. Trimmer & Sons,* (1916), 162 N. Y. Supp. 603; *Nikkiczuk* v. *McArthur,* (Alberta, 1916), 28 D. L. R. 279.

It must be clear that in some of the cases considered above there was nothing extraordinary about the conditions of employment, and in others the deviation from the normal exposure for that particular employment was

very little. In a Michigan case, *La Veck* v. *Parke, Davis & Co.*, 190 Mich. 604, the facts were that a workman died from slow paralysis due to cerebral hemorrhage. The high temperature of the room in which he worked induced an increase in blood pressure which resulted in the rupture of a small blood vessel in the brain. The court there held that death was due to an accidental injury, and allowed recovery. The court said, "Mr. La Veck intended to do the prolonged work which the situation demanded, but he did not anticipate that because of doing so his blood pressure would be so increased as to result in the rupture of a cerebral blood vessel." Could not the court have said in the principal case that Mr. Savage intended to do the prolonged work which the situation demanded, but he did not anticipate that because of doing so the muscular contraction due to the formation of ice on his neck would dislocate the axis and atlas vertebrae, producing paralysis? A clear analysis of these two cases will reveal that the situations and causative factors are substantially alike in both. Upon both reason and authority, the principal case seems wrongly decided. In the matter of finding a reasonable guide for determining when an accident has been sustained, the Michigan Supreme Court has been peculiarly unsuccessful. See *La Veck* v. *Parke, Davis & Co., supra; Roach* v. *Kelsey Wheel Co.*, 200 Mich. 299; *Tackles* v. *Bryant & Detwiler Co.*, 200 Mich. 350; *Guthrie* v. *Detroit Shipbuilding Co.*, 200 Mich. 355.